

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
VERONICA GUZMAN-JIMENEZ	:	VIOLATIONS:
	:	18 U.S.C. § 1546(a) (Visa/immigration
	:	fraud - 1 count)
	:	42 U.S.C. § 408(a)(7)(B) (Social Security
	:	fraud - 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

_____ 1. _____ Defendant VERONICA GUZMAN-JIMENEZ was a native of Mexico who illegally entered the United States.

2. Defendant VERONICA GUZMAN-JIMENEZ sought employment at the Henson Group located in Sinking Spring, Pennsylvania in the false name of "MC" and presented a counterfeit alien registration card as proof of legal residency in the United States.

3. On or about March 10, 2010, in the Eastern District of Pennsylvania, defendant

VERONICA GUZMAN-JIMENEZ

knowingly used, attempted to use, possessed, obtained, accepted, and received a document required for entry into and as evidence of authorized stay and employment in the United States, that is, an alien registration receipt card, in the name of "MC," knowing it to be forged,

counterfeited, altered and falsely made, and to have been otherwise procured by fraud and unlawfully obtained.

In violation of Title 18, United States Code, Section 1546(a)._____

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 10, 2010, in the Eastern District of Pennsylvania, defendant

VERONICA GUZMAN-JIMENEZ,

with intent to deceive, and for the purpose of obtaining employment, falsely represented that a Social Security account number with the last four digits 1651, had been assigned to her by the Commissioner of Social Security when in fact such number was not assigned to her.

In violation of Title 42, United States Code, Section 408(a)(7)(B).

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney